IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

INFORMATION

CASE NO.: 25-Cr -09

VIOLATION: 18 U.S.C. § 922(e)

ONE COUNT

MADDEN LAI, Defendant.

THE UNITED STATES CHARGES:

UNITED STATES OF AMERICA

٧.

COUNT ONE

Willful Delivery of Firearm and Ammunition to Common Carrier without Written Notice (18 U.S.C. § 922(e))

On or about February 2, 2025, in the District of Puerto Rico and within the jurisdiction of this Court, the defendant,

MADDEN LAI,

knowingly delivered to Frontier Airlines, a common carrier, for transportation or shipment in interstate commerce, a package or container in which there was a firearm, specifically a SAR Firearms, Model SARB6P, 9mm caliber, bearing serial number T1102-12E00198, and 11 rounds of 9mm caliber ammunition, without written notice to the carrier. All in violation of 18 U.S.C. §§ 922(e) and 924(a)(1)(D).

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FIREARMS AND AMMUNITION FORFEITURE ALLEGATION

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c). Upon conviction of the offense set forth in Count One of this Indictment, the defendant,

MADDEN LAI,

shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved or used in the commission of the offense, including, but not limited to: SAR Firearms, Model SARB6P, 9mm caliber, bearing serial number T1102-12E00198, and 11 rounds of 9mm caliber ammunition.

W. STEPHEN MULDROW United States Attorney

Jeanette M. Collazo-Ortiz

Assistant U.S. Attorney

Deputy Chief, Violent Crimes Unit

Julian N. Radzinschi Assistant U.S. Attorney